

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE**

**UNITED STATES OF AMERICA,
Plaintiff,**

vs.

No. 1:19-cr-10040-JTF-1

**JEFFREY YOUNG,
Defendant.**

MOTION TO CONTINUE SENTENCING DATE

Comes now, Defendant by and through his counsel and Moves this Court to continue the trial currently set on August 3, 2023 to another date and for cause would show:

1. The PSR was just filed and counsel needs more time to review and file objections.
The PSR is over 30 pages long and contained numerous factual allegations that need to be reviewed by Defendant and his counsel. This is difficult over Zoom and will likely require multiple meetings and review of the trial transcript.
2. That counsel likely will need a copy of the transcript, that Mr. Young is indigent and application will need to be made to acquire the transcript.
3. That counsel will be in charge of the TACDL 50th annual CLE held in Memphis on August 3-4, 2023 and will be sworn in as president.
4. Counsel has conferred with attorneys for the Government and they have no objection to this request. They wish to inform the Court that they will be back in Memphis on sentencing hearings on the co-defendants in this case the week of November 29, 2023 and would like for it to be that week.

Wherefore, premise considered, the Defendant requests that this sentencing be reset to the week of November 29, 2023.

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CLAIBORNE H. FERGUSON (BPR 20457)

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of July, 2023, I served a true and correct copy of the foregoing upon the person(s) listed below by the following method(s) of service:

- ☐ Depositing it in the U.S. mail, first class postage prepaid and properly addressed;
- ☐ Hand delivery;
- ☐ Facsimile transmission
- ☒ Electronic Transmission - PACER

U.S. Department of Justice
Criminal Division, Fraud Section
202-257-5852

/s/ Claiborne H. Ferguson